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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DELLA ORTEGA ) Case No.: 2:25-cv-00404-NJK

Plaintiff,

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

v.

FRANK BISIGNANO,  
Commissioner of Social Security,

Defendant.

Defendant, Frank Bisignano, Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 11, filed on June 4, 2025), currently due on July 7, 2025, by 30 days, through and including August 6, 2025. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to August 20, 2025.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. The parties are currently in the middle of settlement discussions. Additional time is needed for the parties to continue settlement discussion and consultation with their clients. Moreover,

1 the novel issues involved in this case have required Defendant's undersigned counsel to seek  
2 assistance from multiple senior attorneys within undersigned counsel's office to properly advocate for  
3 Defendant's interests. Additionally, Defendant's undersigned counsel must take scheduled medical  
4 leave in the middle of July, which increases the amount of time needed for this extension.  
5 Management within undersigned counsel's office has approved this extension.

6 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on July 1,  
7 2025. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

8 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's  
9 Brief, through and including August 6, 2025. This request is made in good faith and with no intention  
10 to unduly delay the proceedings.

11  
12 Dated: July 1, 2025

Respectfully submitted,

13 SIGAL CHATTAH  
14 United States Attorney

15 /s/ David Priddy  
16 DAVID PRIDDY  
17 Special Assistant United States Attorney

18 IT IS SO ORDERED:

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21 UNITED STATES MAGISTRATE JUDGE

22 DATED: July 2, 2025